

DARRYLLE LAWANNA PRESTON v. CITY OF OAKLAND, DEANNA SANTANA
UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
COURT CASE NO. 14-CV-02022-NC

Jury Trial: Monday, September 14, 2015

SECOND AMENDED JOINT TRIAL EXHIBIT LIST

EXHIBIT NO.	DOCUMENT DESCRIPTION	WITNESS	OBJECTED	ADMITTED
A	1/26/07 Employment Application with City of Oakland-Human Resource Manager (OAK 00000902-903)	Lawanna Preston		
B	4/12/07 City of Oakland, Administrative Instruction re Electronic Media Policy (Exhibit Q-Declaration of Sonia Mehta Opposition MSJ)	Judicial Notice		
C	7/1/08 Memorandum of Understanding between City of Oakland and International Association of Firefighters Local 55 (7/1/08 to 6/30/12)(LP 517-521)	Lawanna Preston Judicial Notice		
D	7/6/11 Employment Agreement by City of Oakland and Deanna Santana (Exhibit R-Declaration of Sonia Mehta Opposition MSJ) (LP 1-4)	Deanna Santana		
E	9/26/11 email from Andrea Gourdine to Darryelle LaWanna Preston re FW: Assistant City Administrators Johnson and Blackwell (LP 19-23)	Lawanna Preston	8/5/15 DEF Objection: Relevance (Fed.R.Evid. 401, 402) Hearsay (Fed. R. Evid. 801-803)	
F	11/6/11 email from Barbara Parker to Darryelle LaWanna Preston re Interference in Administration (LP 45-48)	Lawanna Preston Barbara Parker	8/10/15 PL Objection: FRE 401, 403, 802	
G	12/13/11 Agenda Report from Community and Economic Development Agency to Deanna Santana re Resolution Amending Resolution No. 83165 C.M.S. To Authorize An Increase In The Contract With Pulte Homes For The Construction Of The Rainbow Teen Center By \$30,699 From \$121,000 To \$151,699 To Pay For Prevailing Wage Costs (OAK 00000781-784)	Lawanna Preston Deanna Santana		

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H	1/5/12 email from Howard Jordan to Deanna Santana re: Pulte re Rainbow (Exhibit 8-Deposition of Deanna Santana, Vol. 1) (OAK00010078-10080)	Deanna Santana Howard Jordon	8/10/15 PL Objection: FRE 401, 403, 802	
I	1/5/12 email from Deanna Santana to Desley Brooks, Fred Blackwell re Pulte re Rainbow (OAK 00000853-854)	Deanna Santana Fred Blackwell Desley Brooks		
J	1/6/12 email from Deanna Santana to Desley Brooks, Fred Blackwell re Pulte re Rainbow (OAK 00005495-5497)	Deanna Santana	8/10/15 PL Objection: FRE 401, 403	
K	1/20/12 email from Deanna Santana to Darryelle LaWanna Preston, Sabrina Landreth, Scott Johnson re LaWanna (LP 60-63)	Lawanna Preston Deanna Santana	8/10/15 PL Objection: FRE 401, 403, 802	
L	2/16/12 email from Karen Boyd to Deanna Santana, Scott Johnson, Fred Blackwell re SF Chronicle story about Rainbow Teen Center (OAK 00005661-5666)	Deanna Santana Alexandra Orologas	8/10/15 PL Objection: FRE 401, 403, 802	
M	2/16/12 Agenda Report from Fred Blackwell to Deanna Santana re Rainbow Teen Center (OAK 00000785-797)	Lawanna Preston Deanna Santana Fred Blackwell	8/10/15 PL Objection: FRE 401, 403, 802	
N	2/16/12 Agenda Report from Fred Blackwell, LaWanna Preston to Deanna Santana re Rainbow Teen Center, Signed by Santana on 2/16/12 (OAK 00000852)	Lawanna Preston Deanna Santana Fred Blackwell		
O	2/20/12 email from Deanna Santana to Barbara Parker re CONFIDENTIAL DRAFT re Rainbow Teen Center (LP 94-95)	Lawanna Preston Deanna Santana Fred Blackwell	9/15/15 DEF Objection: Attorney-Client Privilege	

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P	2/20/12 email from Barbara Parker to Doryanna Moreno, Deanna Santana, Fred Blackwell, Darryelle LaWanna Preston re BJP's redlined comments and questions and proposed edits (LP 96)	Lawanna Preston Deanna Santana Fred Blackwell Barbara Parker	9/15/15 DEF Objection: Attorney-Client Privilege, Attorney Work Product	
Q	2/24/12 Agenda Report from Fred Blackwell, Preston to Deanna Santana (Exhibit 1-Deposition of Fred Blackwell) (LP 97-119)	Lawanna Preston Deanna Santana Fred Blackwell Barbara Parker	9/15/15 DEF Objection: Attorney-Client Privilege, Attorney Work Product	
R	3/1/12 email from Darryelle LaWanna Preston to Sabrina Landreth, Alexandra Orologas, Deanna Santana re Paragraph (OAK 0013454-13458)	Lawanna Preston Deanna Santana Alexandra Orologas		
S	3/6/12 email from Darryelle LaWanna Preston to Deanna Santana re Sorry (Exhibit 3-Deposition of Darryelle Preston) (OAK00005703)	Lawanna Preston Deanna Santana		
T	3/6/12 email from Deanna Santana to Darryelle LaWanna Preston re Sorry (Exhibit 4-Deposition of Darryelle Preston) (OAK00005706)	Lawanna Preston Deanna Santana		
U	3/6/12 Video Recording of City Council Meeting, filed manually (Exhibit G-Declaration of Sonia Mehta Opposition MSJ) (Section 3:56:20-4:06:58 only)	Lawanna Preston Deanna Santana		
V	3/6/12 Memorandum from Fred Blackwell to Deanna Santana re Rainbow Teen Center (OAK 00001135-1138)	Lawanna Preston Fred Blackwell	8/10/15 PL Objection: FRE 401, 403, 802	

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W	3/7/12 email from Deanna Santana to Fred Blackwell, Darryelle LaWanna Preston, Andrea Gourdine, Kip Walsh, Audree V. Taylor, Scott Johnson re Rainbow Teen Transition (OAK 0013481)	Lawanna Preston Deanna Santana Kip Walsh		
X	3/23/12 email from Teresa Reed to Lawanna Preston re: A couple of things (LP 522)	Lawanna Preston	8/5/15 DEF Objection: Relevance (Fed.R.Evid. 401, 402)	
Y	4/5/12 email from Deanna Santana to Howard Jordan re FYI..I don't know Gary (OAK 00005652-5654)	Deanna Santana Howard Jordon	8/10/15 PL Objection: FRE 401, 403, 802	
Z	Employee Performance Appraisal Form and Performance Plan for Lawanna Preston, April 30, 2011-May 1, 2012 (OAK00001077-1082)	Lawanna Preston Deanna Santana	8/5/15 DEF Objection: Foundation (Fed. R. Evid. § 602.) Relevance (Fed.R.Evid. 401, 402) Hearsay (Fed. R. Evid. 801-803). Not Authenticated (Fed. R. Evid. 901)	
1A	5/11/12 email from Darryelle Lawanna Preston to Scott Johnson re Katano Kasaine (LP 167-168)	Lawanna Preston Deanna Santana Scott Johnson	8/10/15 PL Objection: FRE 401, 403, 802	
1B	7/20/12 email from Darryelle Lawanna Preston to Deanna Santana re FW: Local 21 vs 12918 applicability in making a salary appointment. CONFIDENTIAL (LP 217-219)	Lawanna Preston Deanna Santana Andrea Gourdine	8/10/15 PL Objection: FRE 401, 403, 802	

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1C	8/14/12 email from Katano Kasaine to Scott Johnson, Deanna Santana RE: Labor Questions from Fitch Ratings (OAK 00013405-13407)	Deanna Santana Katano Kasaine Scott Johnson	8/10/15 PL Objection: FRE 401, 403, 802	
1D	8/15/12 email from Darryelle Lawanna Preston to Deanna Santana re FW: Cobra Reimbursement for Susana Macarron (LP 220-224)	Lawanna Preston Deanna Santana		
1E	1/4/13 email from Deana Santana to Lawanna Preston, Howard Jordan, Philip Ewell re: FW: Letter regarding "Return of a Day" Jan 4, 2012 (OAK00000414-416)	Deanna Santana	8/5/15 DEF Objection: Relevance (Fed.R.Evid. 401, 402) Hearsay (Fed. R. Evid. 801-803)	
1F	1/29/13 Inter Office Memorandum from Sonia Lara to Darryelle Lawanna Preston re Response to Memorandum dated January 11, 2011 from Andrea R. Gourdine titled "Deborah Grant Incident Report" (LP 237-238)	Lawanna Preston Deanna Santana Sonia Lara	8/10/15 PL Objection: FRE 401, 403, 802	
1G	1/29/13 Inter Office Memorandum from Darryelle Lawanna Preston to Deanna Santana re Response to A. Gourdine memo dated January 11, 2011 (wrong date) (LP 239-240)	Lawanna Preston Deanna Santana	8/10/15 PL Objection: FRE 401, 403, 802	
1H	3/8/13 email from Deanna Santana to Darryelle LaWanna Preston re Agreement (OAK 00001828-1829)	Lawanna Preston Deanna Santana	8/10/15 PL Objection: FRE 401, 403, 802	
1I	3/8/13 email from Darryelle LaWanna Preston to Lamont Ewell re Fwd: agreement (OAK 00011906-11907)	Lawanna Preston Phillip Lamont Ewell	8/10/15 PL Objection: FRE 401, 403, 802	

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1J	3/10/13 email from Darryelle LaWanna Preston to Deanna Santana re Agreement (OAK 00009247-9249)	Lawanna Preston Deanna Santana	8/10/15 PL Objection: FRE 401, 403, 802	
1K	Philip Lamont Ewell's Confidential Summary Report re: union negotiations, February 20, 2013 (LP 253-257)	Lawanna Preston Phillip Lamont Ewell	8/5/15 DEF Objection: Relevance (Fed.R.Evid. 401, 402) Hearsay (Fed. R. Evid. 801-803) Foundation Improper opinion (Fed. R. Evid. § 602)	
1L	3/21/13 City of Oakland Non-Interference in Administrative Affairs Performance Audit (FY 2009-2010, FY 2011-2012) (OAK 10697, 10715-10718)	Deanna Santana Courtney Ruby	8/10/15 PL Objection: FRE 401, 403, 802	
1M	4/2/13 email from Darryelle LaWanna Preston to Trinette Gist-Skinner, Deborah Grant, Kip Walsh, Katano Kasaine, Dennis C. Kong RE: Union due deductions (OAK 00000435-438)	Lawanna Preston Katano Kasaine Trinette Gist-Skinner Kip Walsh		
1N	5/19/13 email from Darryelle LaWanna Preston to Deanna Santana Re: Labor (OAK 00005390)	Lawanna Preston Deanna Santana		

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1O	6/6/13 email from TC Everett to Judith Dalke, Darryelle LaWanna Preston, Sonia Lara re: Lawanna Preston stopped receiving emails yesterday (LP 271)	Lawanna Preston T.C. Everett	8/5/15 DEF Objection: Relevance (Fed.R.Evid. 401, 402) Hearsay (Fed. R. Evid. 801-803) Foundation (Fed. R. Evid. § 602)	
1P	Deanna Santana email to Katano Kasaine, etc. re: SEIU, August 6, 2013 (LP 321)	Deanna Santana Katano Kasaine	8/5/15 DEF Objection: Foundation (Fed. R. Evid. § 602) Relevance (Fed.R.Evid. 401, 402) Hearsay (Fed. R. Evid. 801-803)	
1Q	6/13/13 email from Alexandria Orologas to Darryelle LaWanna Preston, Deanna Santana, Scott Johnson re Weekly Labor/Budget Meetings (OAK 00000742)	Lawanna Preston Deanna Santana Alexandra Orologas		
1R	6/13/13 email from Deanna Santana to Darryelle LaWanna Preston re Costing Documents (OAK 0013615-13616)	Lawanna Preston Deanna Santana	8/10/15 PL Objection: FRE 401, 403, 802	
1S	6/13/13 email from Deanna Santana to Darryelle LaWanna Preston re Costing Documents (OAK 0013532-13534)	Lawanna Preston Deanna Santana	8/10/15 PL Objection: FRE 401, 403, 802	
1T	6/13/13 email from Deanna Santana to Darryelle LaWanna Preston re Costing Documents (OAK 0013645-13647)	Lawanna Preston Deanna Santana	8/10/15 PL Objection: FRE 401, 403, 802	

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1U	6/13/13 email from Darryelle LaWanna Preston to Alexandra Orologas, Deanna Santana, Scott Johnson re Weekly Labor/Budget Meetings (OAK 00001822)	Lawanna Preston Deanna Santana Howard Jordon Alexandra Orologas	8/10/15 PL Objection: FRE 401, 403, 802	
1V	6/20/13 email from Trinette Gist-Skinner to Winnie Anderson, Donna Hom, Mark Hoffman, Stewart McGehee re Paramedic Support Program (PSP) (OAK 00013409)	Lawanna Preston Winnie Anderson Trinette Gist-Skinner		
1W	6/21/13 email from Winnie Anderson to Trinette Gist-Skinner, Donna Hom, Mark Hoffman, Stewart McGehee re: Paramedic Support Program (PSP) (OAK 00001017)	Lawanna Preston Winnie Anderson Trinette Gist-Skinner		
1X	6/24/13 email from Winnie Anderson to Trinette Gist-Skinner, Stewart McGehee, Mark Hoffman, Tracey Chin, Teresa DeLoach Reed re: Paramedic Support Program (PSP) (OAK 00001020-1023)	Lawanna Preston Winnie Anderson Trinette Gist-Skinner Teresa DeLoach Reed		
1Y	6/25/13 email from Winnie Anderson to Trinette Gist-Skinner re Paramedic Support Program (PSP) (OAK 00012115-12119)	Lawanna Preston Winnie Anderson Trinette Gist-Skinner Teresa DeLoach Reed		
1Z	6/25/13 email from Trinette Gist-Skinner to Winnie Anderson RE: Paramedic Support Program (PSP) (OAK 00001033-1046)	Lawanna Preston Winnie Anderson Trinette Gist-Skinner		
2A	6/26/13 email from Winnie Anderson to Darryelle LaWanna Preston re Failure to Collect Dues Grievance TPTs 06 26 (OAK 00007381-7382)	Lawanna Preston Deanna Santana Winnie Anderson Joe Keffer		

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2B	6/26/13 email from Winnie Anderson to Joe Keffer, Darryelle LaWanna Preston, Deanna Santana, Sonia Lara, Anne Campbell-Washington, Scott Seneca, Pete Castelli re Failure to Collect Dues Grievance TPTs 06 26 (OAK 0013970)	Lawanna Preston Deanna Santana Winnie Anderson Joe Keffer		
2C	6/26/13 email from Joe Keffer to Darryelle LaWanna Preston, Deanna Santana, Winnie Anderson, Sonia Lara, Anne Campbell-Washington re Failure to Collect Dues Grievance TPTs 06 26 (Exhibit 6-Deposition of Darryelle LaWanna Preston)	Lawanna Preston Deanna Santana Winnie Anderson Joe Keffer Sonia Lara		
2D	6/28/13 Agreement between The City of Oakland and International Association of Firefighters, Local 55 (Exhibit 2-Deposition of Winnie Anderson) (OAK00005439)	Lawanna Preston Winnie Anderson Trinette Gist-Skinner Teresa DeLoach Reed		
2E	7/3/13 email from Darryelle LaWanna Preston to Barbara Parker, Doryanna Moreno, Jamie Smith re FW: Amending the Local 55 MOU (LP 283-285)	Lawanna Preston Deanna Santana Winnie Anderson Teresa DeLoach Reed		
2F	7/3/13 email from Winnie Anderson to Teresa DeLoach Reed, Darryelle LaWanna Preston re Local 55 (OAK 00001050)	Lawanna Preston Deanna Santana Winnie Anderson Teresa DeLoach Reed		
2G	7/3/13 email from Teresa DeLoach Reed to Deanna Santana to Winnie Anderson, Darryelle LaWanna Preston, Deanna Santana re Local 55 (OAK 00001051-1052)	Lawanna Preston Deanna Santana Winnie Anderson Teresa DeLoach Reed		

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2H	7/3/13 email from Darryelle LaWanna Preston to Deanna Santana, Doryanna Moreno, Barbara Parker, Randolph Hall re Request for legal advice re Fire Chief's extension of Local 55 agreement/sideletter (LP 290-291)	Lawanna Preston Deanna Santana Barbara Parker		
2I	7/4/13 email from Darryelle LaWanna Preston to Desley Brooks re Fwd: Amending the Local 55 MOU (Exhibit E-Declaration of Darryelle Preston Opposition MSJ) (LP 286-289)	Lawanna Preston Deanna Santana Barbara Parker Desley Brooks		
2J	7/5/13 email from Winnie Anderson to Teresa DeLoach Reed, Darryelle LaWanna Preston, Deanna Santana re Local 55 (OAK 00007358-7359)	Lawanna Preston Deanna Santana Winnie Anderson Desley Brooks		
2K	7/5/13 email from Trinette Gist-Skinner to Preston, Winnie Anderson re PSP Program Status (Exhibit 3-Deposition of Teresa DeLoach Reed) (OAK00005436-5437)	Lawanna Preston Deanna Santana Winnie Anderson Trinette Gist-Skinner Teresa DeLoach Reed		
2L	7/6/13 email from Deanna Santana to Teresa DeLoach Reed, Darryelle LaWanna Preston, Deanna Santana, Donna Hom re: Closed Session PSP 7/3/13 (OAK 00005380-5384)	Lawanna Preston Deanna Santana Teresa DeLoach Reed		
2M	7/11/13 email from Darryelle LaWanna Preston to Zachary Unger, Teresa DeLoach Reed, Dan Robertson, Trinette Gist-Skinner, Winnie Anderson re FW: Any word? (OAK 00001056-1058)	Lawanna Preston Deanna Santana Winnie Anderson Trinette Gist-Skinner		

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2N	7/11/13 email from Darryelle LaWanna Preston to LaTonda Simmons re FW: Correction Needed-W Anderson Pay Rate (OAK 00009297-9298)	Lawanna Preston Deanna Santana Sonia Lara Katano Kasaine LaTonda Simmons		
2O	7/12/13 email from Deanna Santana to Preston, Sonia Lara re Correction Needed-W Anderson Pay Rate (LP 294-295)	Lawanna Preston Deanna Santana		
2P	7/25/13 City of Oakland, Meeting Minutes re Special Meeting of the Oakland City Council (Exhibit F- Declaration of Sonia Mehta Opposition MSJ)	Judicial Notice		
2Q	7/26/13 email from Alexandra Orologas to Darryelle LaWanna Preston, Deanna Santana re MOU closed session reports (OAK 00000734)	Lawanna Preston Deanna Santana Alexandra Orologas	8/10/15 PL Objection: FRE 401, 403, 802	
2R	7/26/13 email from Deanna Santana to Darryelle LaWanna Preston, Alexandra Orologas re MOU closed session reports (OAK 00005404)	Lawanna Preston Deanna Santana Alexandra Orologas	8/10/15 PL Objection: FRE 401, 403, 802	
2S	7/29/13 email from Deanna Santana to Darryelle Lawanna Preston, Barbara Parker, Alexandria Orologas re OPOA Closed Session Labor Report TA annuitants 7/30/13 (LP 309-312)	Lawanna Preston Deanna Santana Alexandra Orologas Barbara Parker	8/10/15 PL Objection: FRE 401, 403, 802	
2T	7/30/13 email from Deanna Santana to Darryelle LaWanna Preston, Barbara Parker, Alexandra Orologas, Arturo M. Sanchez re FW: OPOA Closed Session Labor Report TA annuitants 7/30/13 (LP 313-316)	Lawanna Preston Deanna Santana Alexandra Orologas Barbara Parker	8/10/15 PL Objection: FRE 401, 403, 802	

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2U	7/31/13 email from Zac Unger to Teresa DeLoach Reed, Stewart McGehee, Dan Robertson, Deanna Santana re Paramedic Support Program ends tomorrow (OAK 00005435)	Lawanna Preston Deanna Santana Teresa DeLoach Reed	8/10/15 PL Objection: FRE 401, 403, 802	
2V	8/1/13 email from Deanna Santana to Katano Kasaine, Preston, Alexandra Orologas, Fred Blackwell, Donna Hom re Scheduling Meeting on August 5, 2013 (Exhibit 2-Deposition of Deanna Santana) (LP 319)	Deanna Santana Katano Kasaine	8/10/15 PL Objection: FRE 401, 403, 802	
2W	8/5/13 email from Darryelle LaWanna Preston to Winnie Anderson, Katano Kasaine, Sonia Lara re Topics SEIU wishes to discuss on August 6 th , if you are available (Exhibit 5-Deposition of Darryelle Preston)	Lawanna Preston Winnie Anderson Sonia Lara Katano Kasaine		
2X	8/6/13 handwritten notes re SEIU TPT Discussion (Exhibit 2-Deposition of Sonia Lara) (OAK00014062-14063)	Winnie Anderson Sonia Lara Katano Kasaine		
2Y	8/6/13 handwritten notes re meeting with Katano Kasaine, Sonia Lara, Winnie Anderson (Exhibit 16-Deposition of Dwight McElroy)	Winnie Anderson Sonia Lara Katano Kasaine		
2Z	8/6/13 email from Winnie Anderson to Katano Kasaine, Preston, Sonia Lara re Issues raised by SEIU (Exhibit 2-Deposition of Katano Kasaine) (OAK00000987-988)	Lawanna Preston Winnie Anderson Sonia Lara Katano Kasaine		
3A	8/6/13 email from Deanna Santana to Darryelle Lawanna Preston, Amber Todd re TPT Meetings (LP 340-341)	Lawanna Preston Deanna Santana	8/10/15 PL Objection: FRE 401, 403, 802	

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3B	8/13/13 email from Donna Hom to Darryelle LaWanna Preston, Amber Todd RE: ER staff assignments (OAK 0013862)	Lawanna Preston Deanna Santana Donna Hom	8/10/15 PL Objection: FRE 401, 403, 802	
3C	8/16/13 email from Darryelle LaWanna Preston to Deanna Santana, Amber Todd re TPT Meetings (OAK 00000447-450)	Lawanna Preston Deanna Santana	8/10/15 PL Objection: FRE 401, 403, 802	
3D	8/19/13 email from Scott Johnson to Sonia Lara, Trinette Gist-Skinner, Teresa DeLoach Reed, Arturo M. Sanchez, Deanna Santana, Darryelle LaWanna Preston, Katano Kasaine re FW: PSP vote (OAK00006986)	Lawanna Preston Sonia Lara Scott Johnson		
3E	9/2/13 City of Oakland Grievance Form, Temporary Part Time (TPT) Contract (OAK 00010696)	Lawanna Preston		
3F	9/3/13 Agenda Report from Teresa DeLoach Reed to Deanna Santana re Changes to the Promoted Paramedic Support Program (LP 354-356)	Deanna Santana Teresa DeLoach Reed		
3G	9/5/13 email from Joe Keffer to Darryelle LaWanna Preston, Deanna Santana, Jean Quan re Failure to Collect Dues Grievance (Exhibit A-Declaration of Deanna Santana MSJ) (OAK00013425-13426)	Lawanna Preston Deanna Santana Katano Kasaine Joe Keffer Jean Quan		
3H	9/6/13 City of Oakland & SEIU Contract Bargaining, Union Counter to City (Exhibit 24-Deposition of Dwight McElroy)	Lawanna Preston Dwight McElroy		
3I	9/10/13 email from Katano Kasaine, Darryelle LaWanna Preston, Deanna Santana, Sonia Lara re Failure to Collect Dues Grievance (LP 369-371)	Lawanna Preston Deanna Santana Katano Kasaine		

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3J	9/10/13 email from Lawanna Preston to Katano Kasaine, Deanna Santana, Sonia Lara re: Failure to Collect Dues Grievance (LP 372-373)	Lawanna Preston	Stipulated	
3K	9/10/13 email from Deanna Santana, Katano Kasaine, Preston, Sonia Lara re Failure to Collect Dues Grievance (Exhibit 5-Deposition of Katano Kasaine) (OAK00010331)	Lawanna Preston Deanna Santana Katano Kasaine		
3L	9/11/13 email from Deanna Santana to Darryelle LaWanna Preston re Requesting Reports (OAK 00000115-116)	Lawanna Preston Deanna Santana Katano Kasaine Sonia Lara		
3M	9/12/13 email from Darryelle LaWanna Preston to Sandre Swanson re Fwd: SEIU grievance regarding withholding of union dues (LP 380)	Lawanna Preston Deanna Santana Sandre Swanson		
3N	9/12/13 email from Deanna Santana to Darryelle LaWanna Preston, Barbara Parker RE: SEIU grievance regarding withholding of union dues (OAK 0013488)	Lawanna Preston Deanna Santana Barbara Parker		
3O	9/12/13 email from Darryelle LaWanna Preston to Dan Siegel re FW: SEIU grievance regarding withholding of union dues (OAK 00005395)	Lawanna Preston Deanna Santana Dan Siegel	8/10/15 PL Objection: FRE 401, 403, 501-502	
3P	9/15/13 email from Darryelle LaWanna Preston to Deanna Santana re Temporary Part Time Employee Bargaining (LP 384-386)	Lawanna Preston Deanna Santana		
3Q	9/15/13 email from Darryelle LaWanna Preston to Sonia Lara re FW: Temporary Part Time Employee Bargaining (OAK 00000179-186)	Lawanna Preston Deanna Santana Sonia Lara		

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EXHIBIT NO.	DOCUMENT DESCRIPTION	WITNESS	OBJECTED	ADMITTED
3R	9/15/13 email from Deanna Santana to Darryelle LaWanna Preston re Attached closed session report (OAK 00001130-1133)	Lawanna Preston Deanna Santana		
3S	9/17/13 email from Deanna Santana to Darryelle LaWanna Preston re Fwd: SEIU Part Time MOU closed session report (LP 387)	Lawanna Preston Deanna Santana		
3T	9/17/13 email from Darryelle LaWanna Preston to Deanna Santana, Barbara Parker re SEIU grievance regarding withholding of union dues (LP 390-391)	Lawanna Preston Deanna Santana Barbara Parker		
3U	9/17/13 email from Darryelle LaWanna Preston to Dan Siegel re Salary ordinance for Employee Relations staff (OAK 00001772-1784)	Lawanna Preston Deanna Santana Dan Siegel	8/10/15 PL Objection: FRE 401, 403, 501-502	
3V	9/18/13 email from Deanna Santana to Darryelle LaWanna Preston, Barbara Parker re SEIU grievance regarding withholding of union dues (LP 407-408)	Lawanna Preston Deanna Santana Barbara Parker		
3W	9/19/13 email from Darryelle LaWanna Preston to Barbara Parker, Doryanna Moreno re FW: Failure to Collect Dues Grievance (LP 409-412)	Lawanna Preston Deanna Santana Barbara Parker		
3X	9/27/13 email from Deanna Santana to Joe Keffer re Failure to Collect TPT Dues or Agency Fees Greivance (Exhibit 6-Deposition of Joe Keffer) (LP 425)	Deanna Santana Joe Keffer		
3Y	9/27/13 email from Barbara Parker to Deanna Santana re SEIU grievance regarding withholding of union dues (OAK 00014080-14081)	Lawanna Preston Deanna Santana Barbara Parker		

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EXHIBIT NO.	DOCUMENT DESCRIPTION	WITNESS	OBJECTED	ADMITTED
3Z	9/27/13 email from Joe Keffer to Deanna Santana, Lawanna Preston, Anne Campbell-Washington, Barbara Parker re Failure to Collect TPT Dues or Agency Fees Grievance (McElroy deposition Exhibit 20)	Deanna Santana Joe Keffer	Stipulated	
4A	9/28/13 email from Donna Hom to Deanna Santana RE: SEIU grievance regarding withholding of union dues (OAK 00014074-14075)	Deanna Santana Donna Hom		
4B	9/29/13 email from Donna Hom to Deanna Santana, Arturo Sanchez re SEIU grievance regarding withholding of union dues (Exhibit 5-Deposition of Deanna Santana) (OAK00010211-10213)	Deanna Santana Donna Hom		
4C	9/29/13 email from Darryelle LaWanna Preston to Barbara Parker, Deanna Santana re FW: Compliant RE: SEIU Dues deduction grievance 9/2/13 (interfering an investigation) (LP 434)	Lawanna Preston Deanna Santana		
4D	9/29/13 email from Darryelle LaWanna Preston to Cheryl Thompson re Complaint RE: SEIU Dues deduction grievance 9/2/13 (interfering an investigation) (LP 435-436)	Lawanna Preston Deanna Santana Cheryl Thompson		
4E	9/29/13 email from Darryelle LaWanna Preston to Sandre Swanson re FW: Failure to Collect TPT Dues or Agency Fees Grievance (OAK 00001121)	Lawanna Preston Deanna Santana Sandre Swanson Dan Siegel		
4F	9/29/13 email from Darryelle LaWanna Preston to Sandre Swanson re FW: Failure to Collect TPT Dues or Agency Fees Grievance (OAK 00001122)	Lawanna Preston Deanna Santana Sandre Swanson Dan Siegel		

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EXHIBIT NO.	DOCUMENT DESCRIPTION	WITNESS	OBJECTED	ADMITTED
4G	9/29/13 email from Darryelle LaWanna Preston to Cheryl Thompson re Compliant RE: SEIU Dues deduction grievance 9/2/13 (interfering an investigation) (LP 435-436)	Lawanna Preston Deanna Santana Cheryl Thompson		
4H	9/29/13 email from Darryelle LaWanna Preston to Dan Siegel re FW: Compliant RE: SEIU Dues deduction grievance 9/2/13 (interfering an investigation) (OAK 00005478)	Lawanna Preston Deanna Santana Barbara Parker Dan Siegel	8/10/15 PL Objection: FRE 401, 403, 501-502	
4I	9/29/13 email from LaTonda Simmons to Darryelle LaWanna Preston re FW: Compliant RE: SEIU Dues deduction grievance 9/2/13 (interfering an investigation) (OAK 00005476-5477)	Lawanna Preston Deanna Santana LaTonda Simmons		
4J	9/30/13 email from John Lois to Deanna Santana, Oliver Cunningham re Internal Affairs Investigation (Exhibit 6-Deposition of Sonia Lara (OAK 00010579-10621)	Deanna Santana John Lois	8/10/15 PL Objection: FRE 401, 403, 802	
4K	10/1/13 email from Katano Kasaine to Dwight McElroy re Meeting Re: TPT Grievance (Exhibit 21-Deposition of Dwight McElroy)	Katano Kasaine Dwight McElroy		
4L	10/1/13 email from Alexandra Orologas to Joe Keffer re Response to SEIU's Grievance and Meeting Request (Exhibit 23-Deposition of Dwight McElroy)	Deanna Santana Alexandra Orologas Joe Keffer		
4M	10/1/13 email from Darryelle LaWanna Preston to Sonia Lara re FW: Information Request (OAK 00001833-1836)	Lawanna Preston Deanna Santana Winnie Anderson Sonia Lara		

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EXHIBIT NO.	DOCUMENT DESCRIPTION	WITNESS	OBJECTED	ADMITTED
4N	10/2/13 email from Winnie Anderson to Darryelle LaWanna Preston re Information Request (OAK 0013854-13856)	Lawanna Preston Deanna Santana Winnie Anderson Sonia Lara		
4O	10/2/13 email from Winnie Anderson to Sequonite Buggs, Angela Osayande, Darryelle LaWanna Preston, Sonia Lara re Information Request (OAK 00010395-10398)	Lawanna Preston Deanna Santana Winnie Anderson Sonia Lara		
4P	10/2/13 City/SEIU Local 1021 TPT Negotiations 2013 Tentative Agreement (Keffer deposition exhibit 13)	Lawanna Preston Joe Keffer	8/5/15 DEF Objection: Relevance, (Fed.R.Evid. 401, 402) Subsequent remedial measures (Fed.R.Evid. 407)	
4Q	10/3/13 City of Oakland Notice of Termination of Employment (Exhibit 1-Deposition of Deanna Santana) (OAK00000894-895)	Lawanna Preston Deanna Santana		
4R	10/3/13 email from Deanna Santana to Darryelle LaWanna Preston re Services No Longer Needed (LP 440-442)	Lawanna Preston Deanna Santana		
4S	12/18/13 email from Sharon Holman to Katano Kasaine re FW: SEIU Local 1021: Audit-Active Non-Payers (OAK 00010684-10686)	Lawanna Preston		

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EXHIBIT NO.	DOCUMENT DESCRIPTION	WITNESS	OBJECTED	ADMITTED
4T	12/11/13 email from Katano Kasaine to Deanna Santana re: Fwd: meeting with SEIU on their grievance (OAK00005676)	Sonia Lara	8/5/15 DEF Objection: Relevance (Fed.R.Evid. 401, 402) Subsequent remedial measures (Fed.R.Evid. 407) Foundation (Fed. R. Evid. § 602)	
4U	12/20/13 email from Winnie Anderson to Alan Crowley re Letter to SEIU TPT employees re: Agency Fees (OAK 0010648-10675)	Winnie Anderson		
4V	3/17/14 Filed Summons and Complaint (Exhibit 1-Deposition of Darryelle LaWanna Preston)	Lawanna Preston	8/10/15 PL Objection: FRE 401, 403, 802	
4W	3/19/14 SF Gate Article re Ex-Oakland Employees Lost Job for Refusing to Lie	Judicial Notice	8/10/15 PL Objection: FRE 401, 403, 802	
4X	4/2/14 Dan Siegel video clip on Darryelle LaWanna Preston Lawsuit	Judicial Notice	8/10/15 PL Objection: FRE 401, 403	
4Y	6/30/14 Oakland Council District 6 Race Campaign Finance Contributions	Lawanna Preston	8/10/15 PL Objection: FRE 401, 403	
4Z	6/10/15 Declaration of Darryelle LaWanna Preston in support of opposition to defendants' motion for summary judgment	Lawanna Preston	8/10/15 PL Objection: FRE 401, 802	

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EXHIBIT NO.	DOCUMENT DESCRIPTION	WITNESS	OBJECTED	ADMITTED
5A	Undated Lawanna D. Preston Resume (Exhibit A-Declaration of Darryelle Preston Opposition MSJ) (LP 450-451)	Lawanna Preston		
5B	Undated Oakland City Council Ordinance Amending Salary Schedule (Exhibit 6-Deposition of Katano Kasaine) (OAK00000032)	Judicial Notice		
5C	Undated Investigative Report-SEIU Grievance to City of Oakland re Temporary Part Time (TPT) Contract (Exhibit 1-Deposition of Otis McGee)	Otis McGee, Jr.	8/10/15 PL Objection: FRE 401, 403, 802	
5D	Alameda County Grand Jury Report (2012-2013)	Judicial Notice	8/10/15 PL Objection: FRE 401, 403, 802	
5E	Plaintiff's Responses to Request for Production of Documents (Set One) (Served on 11/19/14)	Lawanna Preston	8/10/15 PL Objection: FRE 401, 403, 802	
5F	Plaintiff's Supplemental Responses to Request for Production of Documents (Set One) (Served on 2/10/15)	Lawanna Preston	8/10/15 PL Objection: FRE 401, 403, 802	
5G	Plaintiff's Responses to Special Interrogatories (Set One), with Verification (Served on 11/19/14)	Lawanna Preston	8/10/15 PL Objection: FRE 401, 403, 802	
5H	Plaintiff's Supplemental Responses to Special Interrogatories (Set One), with Verification (Served on 1/29/15)	Lawanna Preston	8/10/15 PL Objection: FRE 401, 403, 802	
5I	Plaintiff's Responses to Request for Admissions (Set One) (Served on 2/30/15)	Lawanna Preston	8/10/15 PL Objection: FRE 401, 403, 802	

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EXHIBIT NO.	DOCUMENT DESCRIPTION	WITNESS	OBJECTED	ADMITTED
5J	1/12/12 email from Alexandra Orologas to LaWanna Preston, Scott Johnson re ER move (LP 59)	Lawanna Preston	Stipulated	
5K	2/15/12 email from LaWanna Preston to Alexandra Orologas re Paragraph for LaWanna's Review (OAK 716)	Lawanna Preston	8/5/15 DEF Objection: Relevance (Fed.R.Evid. 401, 402)	
5L	7/3/13 email from Teresa DeLoach Reed to Winnie Anderson, LaWanna Preston, Deanna Santana re Local 55 (OAK 1054-1055)	Teresa DeLoach Reed	8/5/15 DEF Objection: Incomplete Document (Fed.R.Evid. 106)	
5M	7/5/13 email from Deanna Santana to Teresa DeLoach Reed re PSP (OAK 1053)	Deanna Santana	8/5/15 DEF Objection: Incomplete Document (Fed.R.Evid. 106) Relevance (Fed.R.Evid. 401, 402) Hearsay (Fed.R.Evid. 801-803)	
5N	8/6/13 email from Deanna Santana to Katano Kasaine, Donna Hom, Alexandra Orologas, LaWanna Preston, Scott Johnson re TPT-ppt workplan (LP 321)	Deanna Santana Katano Kasaine	8/5/15 DEF Objection: Foundation (Fed.R.Evid. 602) Relevance (Fed.R.Evid. 401, 402) Hearsay (Fed.R.Evid. 801-803)	

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EXHIBIT NO.	DOCUMENT DESCRIPTION	WITNESS	OBJECTED	ADMITTED
5O	8/19/13 email from Arturo Sanchez to Trinette Gist-Skinner, Scott Johnson, Amber Todd, Teresa DeLoach Reed re FW: PSP vote (OAK 6982-6983)	Teresa DeLoach Reed	8/5/15 DEF Objection: Relevance (Fed.R.Evid. 401, 402) Hearsay (Fed.R.Evid. 801-803)	
5P	10/14/13 email from Barbara Parker to Joe Keffer, Deanna Santana, Donna Hom, Alexandra Orologas re TPT Dues Grievance (Exh. 11 to Keffer Deposition)	Joe Keffer	8/5/15 DEF Objection: Relevance (Fed.R.Evid. 401, 402) Subsequent Remedial Measures (Fed.R.Evid. 407) Hearsay (Fed.R.Evid. 801-803) More Prejudicial than Probative (Fed.R.Evid. 403)	
5Q	10/27/09 memorandum from Department of Human Resources Management to Office of City Administration, Attention Dan Lindheim re Supplemental Report to the Annual Report Detailing the Terms and Conditions of Employment for Unrepresented Employees As Required By Ordinance No. 12903 C.M.S.			
5R	9/24/12 letter from Barry Donelan to Deanna Santana re Negotiation Concerns with City Staff (OAK 00012077-12078)			

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5S	7/12/13 email from Dan Robertson to Darryelle Lawanna Preston, Teresa DeLoach Reed, Trinette Gist-Skinner, Winnie Anderson, Zac Unger, Deanna Santana, Chuck Garcia, Jim Whitty re Local 55 furlough day give back equivalency (2:32 p.m.) (OAK 00012091-12096)			
5T	7/23/13 email from Zac Unger to Deanna Santana, Dan Roberston re the state of our union (3:19 p.m.) (OAK 00001075-1076)			
5U	10/17/06 Oakland City Council Resolution No. 80211 C.M.S.			
5V	11/5/68 Charter of City of Oakland adopted by People of City of Oakland, Ratified 1/28/69, Amended November, 2008			
5W	Law cited in Plaintiff's Complaint Section 3502-Right to join or abstain; individual representation			
5X	Law cited in Plaintiff's Complaint Section 3506-Discrimination prohibited			
5Y	Law cited in Plaintiff's Complaint Section 3508.5-Right to authorize dues deductions; effect of chapter			
5Z	6/28/11 Letter of Understanding Between City of Oakland and International Association of Firefighters, Local 55, Regarding Contract Extension (OAK 00012182-12355)			

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EXHIBIT NO.	DOCUMENT DESCRIPTION	WITNESS	OBJECTED	ADMITTED
6A	7/26/11 Memorandum of Understanding Between City of Oakland and Oakland Police Officers' Association (7/1/06 to 6/30/15) (Resolution No. 83508 CMS)			
6B	7/26/11 Memorandum of Understanding Between City of Oakland and Service Employees International Union, Local 1021 (7/1/11 to 6/30/13) (Resolution No. 83519 CMS)			
6C	1/29/13 InterOffice Memorandum from Sonia Lara re Conversation re: Temporary Agencies (LP 241) and 9/21/12 email from Sonia Lara to Andrea Gourdine re Timeline for the request of a RFP for Temporary Agencies Services (LP 499-500)			
6D	Undated City Amendment to Administrative Instruction 1030 (Exh. 22 to McElroy Deposition)			
6E	9/6/13 Union Counter to City (Exh. 12 to Keffer Deposition)			
	END OF LIST			

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